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February 5, 1993

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Wayne A. Reser  
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FCC  
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Washington, DC 20554

Dear Commisioners,

I recently learned that a Notice of Proposed Rule Making (**NPRM-PR Docket 92-235**) was issued concerning a massive frequency restructuring. As an entrepreneur and model airplane hobbyist, I am **deeply concerned** about the ramifications of such a restructuring.

As I understand it, the plan would create more land mobile frequencies by splitting them into narrower bandwidths in conjunction with a band plan reorganization. As a result, many land mobile frequencies will move dangerously close to frequencies currently assigned to model use in the 72MHz and 75MHz bands. **PLEASE DO NOT APPROVE THIS PLAN!**

It is unacceptable for three reasons:

**SAFETY.** Modern model aircraft can have wing spans of over 10 feet and can weigh 40 pounds or more. Some can reach speeds in excess of 100 mph. When flying these aircraft, hobbyists go to great lengths to assure the safety of operators, bystanders and personal property.

The proposed changes would allow a mobile transmitter **four times the power** of a model's transmitter to operate **only 2.5kHz away** from a large number of currently assigned model frequencies of 72MHz and 75MHz. In addition, the technical specifications for the new equipment would allow a legal frequency tolerance which could place the mobile equipment's signal directly on a nearby model aircraft frequency! Not only are these new frequencies dangerously close, they are designated as **"mobile"**, and could move into a radio controlled aircraft's operating area without warning. **These conditions WILL result in interference** and would negate the most stringent safety precautions taken by model aircraft pilots. Aircraft that are "knocked down" by this interference **WILL threaten the safety of individuals and property.**

If the proposed changes are implemented, responsible model aircraft pilots would be forced to utilize frequencies that would be unaffected by land mobile frequency interference. Unfortunately, of the 50 frequencies currently available,

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to model aircraft pilots, **31 will be rendered useless**, including the 3 frequencies that I use. Since safety precautions of many model aircraft clubs must already involve careful coordination of radio frequencies, the resulting congestion that will occur on the remaining 19 frequencies **will greatly decrease established safety margins**.

**EQUIPMENT INVESTMENT.** Please understand that radio transmitters and receivers represent a significant investment to the model aircraft pilot. They can range in price from \$100 to \$1000 or more, depending upon the type of model aircraft for which they are intended. Model aircraft are another matter. A simple model might cost several hundred dollars, however, many modelers invest thousands of dollars into a single aircraft.

**ALL of my radio equipment will be rendered useless if the proposed plan is implemented** and since I do not have the economic resources to replace it, I find that my investment in airplanes, engines and other supporting equipment is also at risk, and this represents a far greater percentage of my total dollar investment than my radio gear!

**ITS BUSINESS!** For many, aero-modeling is not just a hobby, **it is their livelihood!** I for one, was hoping to start my own aero-modeling business in the near future. Unfortunately, the proposed plan will deal a serious blow to the aero-modeling industry and I cannot risk my financial future when something as critical as the frequency plan is in jeopardy. Moreover, there are thousands of existing small businesses (hobby shops, manufacturers, distributors, etc.) that will suffer to some degree, from the fall-out of this plan if it is adopted.

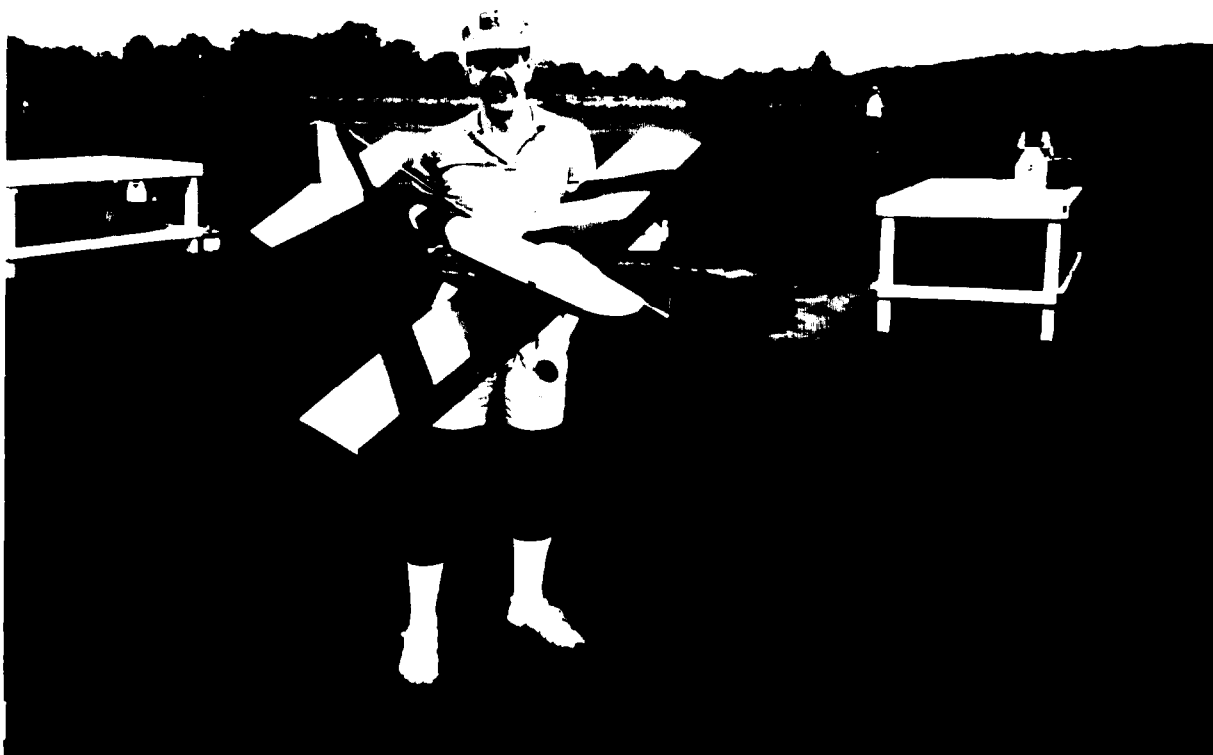
**In short**, I do not think it is wise to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The hobby is a livelihood for many, provides enjoyment to thousands and contributes to the advancement and development of the commercial aviation industry. **Do not adopt the rules defined in PR DOCKET 92-235.**

Respectfully,

A handwritten signature in cursive script, reading "Wayne A. Reser", followed by a horizontal flourish line.

Wayne A. Reser

cc: Senator John Glenn, Ohio  
Representative Tony Hall, 3rd Dist. of Ohio



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 RADIO & RECEIVER \$100  
 ENGINE \$70  
 FINISHING & MISC HWRE \$60

TOTAL \$370 (W/ TIME)

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WESTERN OHIO RADIO CONTROL SOCIETY (WOCR) FIELD

120 MEMBERS